

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC.,**  
*Plaintiff,*

v.

**MICHAEL K. YOUNG, IN HIS OFFICIAL  
CAPACITY AS PRESIDENT OF TEXAS  
A&M UNIVERSITY,**  
*Defendant.*

No. 4:18-CV-01547

**JOINT STATUS REPORT AND  
MOTION TO EXTEND STAY OF PROCEEDINGS [DKT. NO. 66]**

**To the Honorable United States District Court Judge Lynn Hughes—**

The Parties reported to this Court on June 21, 2019, that they had an agreement in principle to resolve the instant litigation and requested a stay of the proceedings so the Parties could negotiate a final settlement agreement. Dkt. No. 63. In response, this Court issued a stay of the proceedings through October 1, 2019. Dkt. No. 64. At the Parties' request, Dkt. No. 65, the Court granted an additional two-week stay, up to and including October 14, 2019, for the Parties to negotiate the remaining issues between them and report back to the Court. *See* Dkt. No. 66.

As the Parties previously reported, following the order staying the proceedings, the Parties have continued to negotiate a final agreement and have made significant progress. The Parties have come to terms on numerous issues, but the Parties continue to negotiate over costs associated with the litigation. Despite the current disagreement, the Parties anticipate resolving their differences. However, additional time is needed to reach an agreement on these outstanding

issues. Accordingly, the Parties request an additional two-week extension of time, from October 14, 2019, up to and including October 28, 2019, to negotiate the remaining issues between them and report back to the Court.

This Court should grant the requested stay and the extension request. This Court, like every federal court, has inherent authority to control its docket. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936) (referring to the power to stay proceedings as incident to inherent powers of federal courts); *see also In re Stone*, 986 F.3d 898, 902 (5th Cir. 1993) (concluding that federal courts have inherent authority “to protect the efficient and orderly administration of justice and those necessary to command respect for the court’s orders, judgments, procedures, and authority.”). Considering that settlement would resolve this dispute without need for further court intervention, the Parties agree that staying these proceedings and amending the deadlines as indicated above will save scarce judicial resource from being wasted.

#### **CONCLUSION**

This Court should grant the Parties’ joint request for an extension of the stay of proceedings so that they may finalize their agreement resolving this case without further court intervention.

**Dated:** October 11, 2019.

Respectfully submitted,

*/s/ David Greene (with permission)*

DAVID GREENE\*  
ADAM SCHWARTZ  
CAMILLE FISCHER  
Electronic Frontier Foundation  
815 Eddy Street  
San Francisco, CA 94109  
Telephone: (415) 436-9333  
Facsimile: (415) 436-9333 facsimile  
[davidg@eff.org](mailto:davidg@eff.org)

GABRIEL WALTERS\*

PETA Foundation  
1536 16th Street NW  
Washington, DC 20036  
Telephone: (202) 483-7382  
[gabew@petaf.org](mailto:gabew@petaf.org)

CHRISTOPHER W. ROTHFELDER  
Rothfelder & Falick, L.L.P.  
1201 Louisiana St., Suite 550  
Houston, TX 77002  
Telephone: (713) 220-2288  
[crothfelder@rothfelderfalick.com](mailto:crothfelder@rothfelderfalick.com)

*/s/ Eric A. Hudson*

---

ERIC A. HUDSON  
Attorney-in-Charge  
MICHAEL R. ABRAMS  
Assistant Attorneys General  
Office of the Attorney General  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Telephone: (512) 463-2120  
Facsimile: (512) 320-0667  
[eric.hudson@oag.texas.gov](mailto:eric.hudson@oag.texas.gov)  
[michael.abrams@oag.texas.gov](mailto:michael.abrams@oag.texas.gov)

W. REID WITTLIFF  
MARIA AMELIA CALAF  
Wittliff Cutter, PLLC  
1803 West Avenue  
Austin, Texas 78701  
Telephone: (512)960-4865  
Facsimile: (512) 960-4869  
[reid@wittliffcutter.com](mailto:reid@wittliffcutter.com)  
[mac@wittliffcutter.com](mailto:mac@wittliffcutter.com)

**ATTORNEYS FOR DEFENDANT**

\*Admitted *pro hac vice*

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 11th day of October, 2019, a true and correct copy of the foregoing was filed using the Court's CM/ECF system, causing electronic service upon all counsel of record.

*/s/Eric A. Hudson*

---

ERIC A. HUDSON  
Assistant Attorney General